

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,  
PLAINTIFF

v.

TIMOTHY CALLAHAN, FRANCIS M.  
ROACHE, PAUL MURPHY, RICHARD  
WALSH, AND THE CITY OF BOSTON,  
DEFENDANTS

C.A. NO. 04-11193NG

**DEFENDANT, RICHARD WALSH'S, MANDATORY  
DISCLOSURE PURSUANT TO FED. R. CIV. P. 26(a) AND LOCAL RULE 26.2**

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The defendants reserve the right to amend and supplement this list throughout the discovery period in this case.

**(a)(1)(B) Documentation**

The Defendant does not have documents pertaining to this matter other than the transcripts of the original pre-trial hearings, trial, and motion for new trial hearings, which have previously been provided by counsel for the plaintiff.

The defendants reserve the right to amend and supplement this list throughout the discovery period in this case.

**(a)(1)(C) Computation of Damages**

The individual defendant Richard Walsh does not have any insurance which would extend coverage to the allegations contained in the plaintiff's complaint.

**(a)(1)(D) Insurance Coverage**

Not applicable to Defendant.

The defendants reserve the right to amend and supplement this list throughout the discovery period in this case.

Respectfully submitted,  
By Defendant Richard Walsh  
Through his attorney,

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Date: December 5, 2005

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing document has served via ECF filing to all other parties of record on this 5<sup>th</sup> day of December, 2005.

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